

**BURSOR & FISHER, P.A.**

L. Timothy Fisher (State Bar No. 191626)  
1990 North California Blvd., 9th Floor  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-mail: ltfisher@bursor.com

**BURSOR & FISHER, P.A.**

Joseph I. Marchese (*pro hac vice*)  
Max S. Roberts (*pro hac vice*)  
Israel Rosenberg (*pro hac vice*)  
Caroline C. Donovan (*pro hac vice*)  
1330 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Telephone: (646) 837-7150  
Facsimile: (212) 989-9163  
E-mail: jmarchese@bursor.com  
mroberts@bursor.com  
irosenberg@bursor.com  
cdonovan@bursor.com

*Attorneys for Plaintiffs*

*[Additional Counsel Listed on Signature Page]*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

DIANE YOUNG, LANAE JOHNSON, and  
PEARL MAGPAYO, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

SALESFORCE INC.,

Defendant.

Case No. 4:22-cv-09067-JST

**STIPULATION OF VOLUNTARY  
DISMISSAL**

Judge: Hon. Jon S. Tigar

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Pearl Magpayo and Defendant Salesforce, Inc., by and through undersigned counsel, hereby stipulate and agree that: (a) Plaintiff Magpayo's individual claims are voluntarily dismissed with prejudice; (b) the claims of the putative members of the California Website Class<sup>1</sup> and Kaiser Subclass are voluntarily dismissed without prejudice; (c) Counts II and III (both arising from alleged violations of the California Invasion of Privacy Act) are voluntarily dismissed without prejudice; and (d) Count I (arising from alleged violations of the Pennsylvania Wiretap Act) is voluntarily dismissed solely to the extent premised on allegations of purported use of Salesforce's Chat function on Kaiser's website.

Dated: August 1, 2025

**BURSOR & FISHER, P.A.**

By: /s/ L. Timothy Fisher

L. Timothy Fisher (State Bar No. 191626)  
1990 North California Blvd., 9th Floor  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-mail: ltfisher@bursor.com

**BURSOR & FISHER, P.A.**

Joseph I. Marchese (admitted *pro hac vice*)  
Max S. Roberts (admitted *pro hac vice*)  
Israel Rosenberg (admitted *pro hac vice*)  
Caroline C. Donovan (admitted *pro hac vice*)  
1330 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Telephone: (646) 837-7150  
Facsimile: (212) 989-9163  
E-mail: jmarchese@bursor.com  
mroberts@bursor.com  
irosenberg@bursor.com  
cdonovan@bursor.com

*Attorneys for Plaintiffs*

---

<sup>1</sup> Capitalized terms are defined in the Third Amended Class Action Complaint.

1 Dated: August 1, 2025

**MORRISON & FOERSTER LLP**

2 By: /s/ Tiffany Cheung

3 Tiffany Cheung (CA SBN 211497)

4 TCheung@mofo.com

5 Emani N. Oakley (CA SBN 347705)

EOakley@mofo.com

425 Market Street

San Francisco, CA 94105

Telephone: 415.268.7000

Facsimile: 415.268.7522

8 Katie Viggiani (pro hac vice)

9 KViggiani@mofo.com

MORRISON & FOERSTER LLP

250 West 55th Street

New York, NY 10019

Telephone: 212.468.8000

Facsimile: 212.468.7900

13 Elisabeth Hutchinson (pro hac vice)

EHutchinson@mofo.com

MORRISON & FOERSTER LLP

4200 Republic Plaza, 370 Seventeenth Street

Denver, CO 80202-5638

Telephone: 303.592.1500

Facsimile: 303.592.1510

17 Erik Manukyan (CA SBN 340307)

18 EManukyan@mofo.com

MORRISON & FOERSTER LLP

707 Wilshire Boulevard, Suite 6000

Los Angeles, CA 90017-3543

Telephone: 213.892.5200

Facsimile: 213.892.5454

22 *Attorneys for Defendant*

23  
24 **FILER'S ATTESTATION**

25 Pursuant to Local Rule 5-1(i)(3), I, L. Timothy Fisher, attest that concurrence in the filing  
26 of this document has been obtained by any other signatories to this document.

27 Dated: August 1, 2025

/s/ L. Timothy Fisher